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United States Bankruptcy Court
Northern District of Texas
Fort Worth Division

In Re:

**Jacob Cannon Jr.,
Debtor.**

**Tina Wilson,
Plaintiff**

v.

**Jacob Cannon Jr.,
Defendant.**

Case No. 24-40553-elm

Chapter 7

Adv. No. 24-04034-elm

Judge Edward L. Morris

**ANSWER TO THE COMPLAINT OF
TINA WILSON SEEKING OBJECTION TO DISCHARGE**

Defendant Jacob Cannon Jr. files this answer to the *Complaint of Tina Wilson Objecting to the Dischargeability of Debt Under 11 U.S.C. 523* [Adv. Dkt. No. 1] (“Complaint”). In support of his answer, Defendant responds to the Complaint as follows:

1. Defendant admits the allegations in paragraph 1.
2. Defendant admits the allegations in paragraph 2.
3. Defendant admits the allegations in paragraph 3.
4. Defendant admits the allegations in paragraph 4.
5. Defendant admits the allegations in paragraph 5.
6. Defendant admits the allegations in paragraph 6.

7. Defendant denies the allegations in paragraph 7.
8. Defendant admits the allegations in paragraph 8.
9. Defendant admits the allegations in paragraph 9.
10. Defendant admits the allegations in paragraph 10.
11. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11.
12. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 12.
13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13.
14. Defendant is without knowledge or information sufficient to form a belief as to the truth of paragraph 14.

Further Response

15. The final judgment in Cause No. CC-21-02654-D is pending an appeal filed by the Defendant in case no 05-23-01185-CV in the Court of Appeal for the Fifth Appellate District Court of Texas. The appeal was filed on November 20, 2023, and has been fully briefed. The parties are awaiting for a ruling by the appellate court. If successful on appeal, the final judgment may be reversed and possibly remanded for further proceedings which may affect the judgment amount and nondischargeability aspects of the final judgment.
16. For these reasons, the Defendant asks this court to abate or otherwise pause this adversary proceeding until the appellate court has ruled on the merits of the appeal.

FOR THESE REASONS the Court should enter a judgment that Plaintiff takes nothing, dismiss the suit with prejudice, and award the Defendant costs and expenses, and all other relief the Court deems appropriate.

Respectfully submitted:

By: /s/ Clayton L. Everett
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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, a true and correct copy of the above answer was served via electronic means through the Court's ECF system to the following:

Counsel for Plaintiff:

Jonathan Wharton

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 /s/ Clayton L. Everett